Patrick Laux
Thunderbird Products Inc.
2200 Monroe Street
Decatur, IN 46733

Re: 001-11543
First Significant Permit Modification to
Part 70 No.: T 001-5903-00031

Dear Patrick Laux:

Thunderbird Products Inc. was issued a permit on October 14, 1999 for fiberglass pleasure boats manufacturing plant. A letter requesting changes to this permit was received on November 15, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes descriptive information and monitoring conditions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
GS
cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Thunderbird Products, Inc.
2200 Monroe Street
Decatur, Indiana 46733

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T001-5903-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:
First Significant Permit Modification No.: T 001-11543	Pages affected: 4, 27, 28, 29, 30, 31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Emergency/Deviation Occurrence Report
Quarterly Report Form (250 tons of VOCs/year)
Quarterly Compliance Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a source constructed in 1987 and manufactures fiberglass pleasure boats. The process involves fiberglass lamination, gel coating, wood/plastic working, assembly and spray painting. The facility has 20 significant stacks.

Responsible Official:	Patrick Laux
Source Address:	2200 Monroe Street, Decatur, IN 46733
Mailing Address:	2200 Monroe Street, Decatur, IN 46733
Phone Number:	(219) 724-9111
SIC Code:	3732 - Boat building
County Location:	Adams
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.3 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.

(b) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of 0.03 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.

(c) Five (5) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.25 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents,#18, #19, #20, #21, and #22.

(d) Seven (7) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, AV7, and AV8 with a maximum capacity of 0.13 boats per hour per area, using dry filters as control, and exhausting to stacks/vents,#3, #4, #5, #6, #7, and #8.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources (fourteen space heaters H1 through H14 and two (2) gel spray booth heaters, SBH1 and SBH2) with heat input equal to or less than 10 MMBtu per hour each.

(b) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.3 boats per hour per booth using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.

b) Four (4) stationary resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, with a maximum capacity of 0.03 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.

c) Five (5) IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.25 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #18, #19, #20, #21, and #22.

d) Seven (7) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, AV7, and AV8 with a maximum capacity of 0.13 boats per hour per area, using dry filters as control, and exhausting to stacks/vents #3, #4, #5, #6, #7, and #8.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to the construction permit CP (01) 1658 issued in October 20, 1987, this source is subject to BACT requirements for VOC emissions. The current BACT requirements for fiberglass operations have been determined to be similar to the MACT determination under 326 IAC 2-1-3.4. Therefore, pursuant to the MACT determination under 326 IAC 2-1-3.4 and Construction Permit CP (01) 1658 issued in October 20, 1987, operating conditions for the fiberglass and painting operations shall be the following:

(a) Monthly usage by weight, volatile organic content, method of application, and other emission reduction techniques for each gel coat, resin, and paint shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: “CFA Emission Models for the Reinforced Plastics Industries”, Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(c) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) # (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and/or other emission reduction techniques).

Where:Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(d) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:
(1) to apply 50% of all neat resins within 6 months of commencement of operation.

(2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(c) above, elsewhere in the process.

(e) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(f) The listed work practices shall be followed:
(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall

be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.

(6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to PC (01) 1658, issued on October 20, 1987, the entire facility shall be limited to less than 20.83 tons of VOC emissions per month period rolled on a monthly basis.

(b) Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to PC (01) 1658, issued on October 20 1987, the PM from the nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.1.3. shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be

determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

Pursuant to PC (01) 1658 issued in October 20, 1987, the dry filters for PM control shall be in operation at all times when these nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters on Stationary Booth, Paint Spray Booth and Lamination Area Station. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, and from Lamination Area Stacks AV1, AV2, AV3, AV4, AV5, AV6, AV7, and AV8 while one or more of the units are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating and lamination emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound emission limit established in Condition D.1.2.

(1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the monthly usage;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) The calculated total volatile organic compound emissions from resin and gel coat use for each month.

(b) To document compliance with Conditions D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit..

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 (a) and (b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Thunderbird Products, Inc.**
Source Location:	**2200 Monroe Street, Decatur, IN 46733**
County:	**Adams**
SIC Code:	**3732**
Operation Permit No.:	**T001-5903-00031**
Operation Permit Issuance Date:	**October 14, 1999**
Significant Permit Modification No.:	**T001-11543-00031**
Permit Reviewer:	**Gurinder Saini**

The Office of Air Management (OAM) has reviewed a modification application from Thunderbird Products, Inc. relating to the operation of fiberglass pleasure boats manufacturing plant.

History

On November 15, 1999, Thunderbird Products, Inc. submitted an application to the OAM requesting modifications to the permit for their existing plant. Thunderbird Products was issued a Part 70 permit on October 14, 1999. These changes are described as follows along-with modifications in the permit language (language deleted is shown with a ~~strikeout~~, language added is shown in **bold**):

1. Responsible official should be changed to Patrick Laux, Plant Manager
   Section A.1- General Information is modified as follows:

   A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

   The Permittee owns and operates a source constructed in 1987 and manufactures fiberglass pleasure boats. The process involves fiberglass lamination, gel coating, wood/plastic working, assembly and spray painting. The facility has 20 significant stacks.
   Responsible Official: ~~Jim Laux~~ **Patrick Laux**

2. The maximum rate of production for each of the four production areas identified should be changed to reflect more appropriate maximum rate. Also a seventh lamination and foam filling area identified as AV8 is to be added.

   The rates of production described in Section A.2 and D.1 are increased as requested by Permittee. This increase in maximum capacity does not result in increase in PTE as this source is still limited by Section D.1.2 to less than 20.83 tons of VOC emission per month period rolled on a monthly basis. Section A.2 and D.1 are modified as follows:

(a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of ~~0.13~~ **0.3** boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.

(b) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of ~~0.005~~ **0.03** boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.

(c) Five (5) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of ~~0.078~~ **0.25** boats per hour per booth, using dry filters as control, and exhausting to stacks/vents,#18, #19, #20, #21, and #22.

(d) ~~Six (6)~~ Seven (7) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, ~~and~~ AV7, **and AV8** with a maximum capacity of 0.13 boats per hour per ~~booth~~ **area**, using dry filters as control, and exhausting to stacks/vents,#3, #4, #5, #6, #7, and #8.

3. Section D.1.9 (a) which describes the requirement for daily inspections of the dry fileters on the stationary booths and the paint spray booth should also include the filters on the lamination area station, AV2 through AV8. D.1.9 (a) also requires weekly ground level stack observations for the surface coating booths to verify the proper operations of the filters. This should also include Lamination Area stacks (AV2 through AV8).

Section D.1.9 (a) is modified as follows:

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters **on Stationary Booth, Paint Spray Booth and Lamination Area Station**. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, **and from Lamination Area Stacks associated with AV2, AV3, AV4, AV5, AV6, AV7, and AV8** while one or more of the ~~booths~~ **units** are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

4. Section D.1.9(b) requires a monthly inspection of the stacks associated with coating emissions, which should also include inspection of stacks from Lamination Areas.

Section D.1.9.(b) is modified as follows:

D.1.9 Monitoring

(b) Monthly inspections shall be performed of the coating **and lamination** emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

5. Section D.1.10(b) should refer to Section D.1.9 in place of D.1.5. Permittee has also asked for modification of wording of this section. The modification to the language of this section is not acceptable.

   Section D.1.10.(b) is modified with respect to reference to Section D.1.9 as follows:

   D.1.10 Record Keeping Requirements

   (b) To document compliance with Conditions D.1.~~5~~**9**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

6. Section D.1.10(c) does not reflect a requirement under D.1.9 and thus should be removed.

   Section D.1.10.(c) and (d) are modified as follows:

   D.1.10 Record Keeping Requirements

   ~~(c) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the fiberglass operations' stack exhaust.~~

   (~~d~~**c**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Existing Approvals

The source was issued a Part 70 Operating Permit T001-5903-00031 on October 14, 1999.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 15, 1999.

Emission Calculations

There were no emission calculations required for this modification

Conclusion

The operation of this stationary fiberglass pleasure boats manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T 001-11543-00031.